

FILED**UNITED STATES DISTRICT COURT****NOV 01 2023**

for the

Northern District of California

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIACivil Division

Carlos Dario Wilson

Case No. 23CV5624KAW

(to be filled in by the Clerk's Office)

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Michael D Kerwin, Sufi Tahbazof-Hariri, agent for
Atlas Property Group, LLC, 345 6th LLC, 363 6th, LLC
And H22 LLC, agent John O'Connor
And Does 1-200

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

*First Amended Complaint***COMPLAINT AND REQUEST FOR INJUNCTION****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Carlos D Wilson</u>
Street Address	<u>345 6th street apt 202</u>
City and County	<u>San Francisco, San Francisco</u>
State and Zip Code	<u>CA</u>
Telephone Number	<u>4157079700</u>
E-mail Address	<u>Carloswilsonsf@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (*if known*). Attach additional pages if needed.

Defendant No. 1

Name	Sufi Tahbazof, agent for 345 6th, LLC
Job or Title (<i>if known</i>)	Process service POC
Street Address	5051 Mission Street
City and County	San Francisco
State and Zip Code	CA 94112
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 2

Name	H22, LLC, John O'Connor
Job or Title (<i>if known</i>)	Process service POC
Street Address	49 Rockaway ave
City and County	San Francisco
State and Zip Code	CA 94127
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 3

Name	363 6th, LLC, Sufi Tahbazof
Job or Title (<i>if known</i>)	Process service POC
Street Address	5051 MISSION ST
City and County	SF
State and Zip Code	CA 94112
Telephone Number	
E-mail Address (<i>if known</i>)	

Defendant No. 4

Name	ATLAS PROPERTY GROUP, LLC Sufi Tahbazof
Job or Title (<i>if known</i>)	Process service POC
Street Address	5051 Mission Street
City and County	SF
State and Zip Code	CA 94112
Telephone Number	
E-mail Address (<i>if known</i>)	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

- Federal question Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Section 1348, title 18 - Fraud
TVPRA 2003 - Human Trafficking
11.432 - Impersonating Officers of the law
Tort Theft

B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual

The plaintiff, *(name)* NA _____, is a citizen of the
State of *(name)* NA _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* NA _____, is incorporated
under the laws of the State of *(name)* NA _____,
and has its principal place of business in the State of *(name)*
NA _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

a. If the defendant is an individual

The defendant, *(name)* NA _____, is a citizen of
the State of *(name)* NA _____ Or is a citizen of
(foreign nation) NA _____.

b. If the defendant is a corporation

The defendant, (name) NA, is incorporated under the laws of the State of (name) NA, and has its principal place of business in the State of (name) NA.
Or is incorporated under the laws of (foreign nation) NA, and has its principal place of business in (name) NA.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

>\$100M because the have deprived me of my freedom and slaved me under a regime of Human Trafficking for 7+ years - beginning just as I completed my studies at UC Berkeley ready to take on the world. During these years they have conspired to murder my mother and brother, to steal their estates and annuities, stolen my farm business, tortured me out of two homes and taken all of my possessions including my ADA-approved service animal.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

San Francisco, CA, Columbus, Ohio and 14 states between as I traveled across the US.

B. What date and approximate time did the events giving rise to your claim(s) occur?

It's difficult to pinpoint a moment in time, but the most egregious trafficking activity began with the murder of my youngest brother, Brian, likely in 2013 in Columbus, then my Mother about a year later.

C. What are the facts underlying your claim(s)? (For example: *What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*)

Since the double homicides of my family, those who conspired to hurt them have taken hold of an annuity fund and their estates. In order to hide these facts from me, they began to stalk and harass me then traffick me for labor, sex and experimentation.

They continue these activities daily even now as i type.

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

As their attacks are ongoing, simply awarding money does not seem likely to stop them from their incorrigible natures. No amount of reason seems to shake them from their egregiousness. I beg of the court injunctive relief.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Emergency Preliminary Injunctions, A freeze on all financial assets, a "Stay away" order and the immediate return of my the funds needed to take care of myself in terms of food, shelter, utilities and medical care which they unlawfully and without due process nor medical authority have taken hostage.

Finally, please order the immediate return of my ADA-approve service animal(s) - a black cat named Shadow.

VI. Certification and Closing

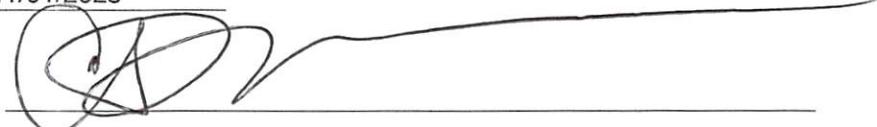
Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 11/01/2023

Signature of Plaintiff



Printed Name of Plaintiff

Carlos Dario Wilson**B. For Attorneys**

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address
